

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

THE ESTATE OF OLIVIA B. GREGGS, by her
Administrator, CHEYENNE GREGGS,

Plaintiff(s),

Case No.: 5:23-cv-00412-DNH-ML

-against-

CLINTON SQUARE OPERATIONS LLC d/b/a
BISHOP REHABILITATION AND NURSING
CENTER, SUNNYSIDE CARE CENTER LLC d/b/a/
SUNNY SIDE CARE CENTER, AART GEURTSEN,
M.D., JOHN AND JANE ROES 1-10; JOHN AND
JANE DOE PHYSICIANS 1-10; RICHARD AND
JANE ROE NURSES, TECHNICIANS, CAN'S AND
PARAMEDICAL EMPLOYEES 1-30; ABC
CORPORATION; ABC PARTNERSHIP (These
names being fictitious as their true identities are
presently unknown),

Defendant(s),

STIPULATION AND ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for all parties, that this action be remanded to the Supreme Court of the State of New York, Onondaga County, without costs or fees to any party.

IT IS FURTHER STIPULATED AND AGREED that nothing in this Stipulation affects any defense of immunity or defensive preemption under the Public Readiness and Emergency Preparedness Act, 42 U.S.C. §§ 247d-6d, 247d-6e.

IT IS FURTHER STIPULATED AND AGREED that Defendant CLINTON SQUARE OPERATIONS LLC d/b/a BISHOP REHABILITATION AND NURSING CENTER's time to

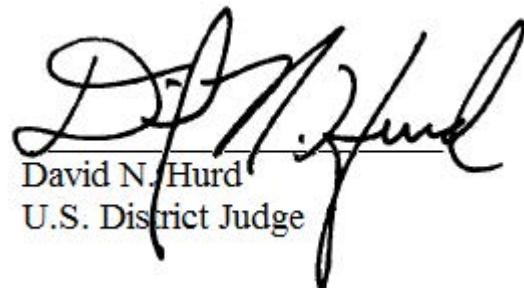
appear, answer, move, or otherwise respond to the Complaint is hereby extended to, and includes,
September 30, 2023.

Dated: August 16, 2023

By: /s/ Christopher LoPalo
Christopher LoPal
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By: /s/ Lori Rosen Semlies
Lori Rosen Semlies
WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER, LLP
Attorneys for Defendant
Clinton Square Operations LLC
d/b/a Bishop Rehabilitation and
Nursing Center
1133 Westchester Avenue
White Plains, NY 10604

SO ORDERED, this 12th day of September, 2023.



David N. Hurd
U.S. District Judge